

FILED

June 21, 2023

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

v.

**(1) GABRIEL RAMOS-AGUILAR,
(2) EDGAR LOERA-PEREZ,
(3) ANGEL OLVERA MENDOZA, and
(4) KAROL RODRIGUEZ-DELGADO,**

Defendants.

Case No: EP:23-CR-01170-DB

INDICTMENT

CT 1: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I),
(a)(1)(A)(ii) and (a)(1)(B)(i) - Conspiracy to
Transport Aliens;

CT 2: 8 U.S.C. §§ 1324(a)(1)(A)(ii) and
(a)(1)(B)(i) - Transporting Aliens for Financial
Gain;

CT 3: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I),
(a)(1)(A)(iii) and (a)(1)(B)(i) - Conspiracy to
Harbor Aliens for Financial Gain;

CT 4: 8 U.S.C. §§ 1324(a)(1)(A)(iii) and
(a)(1)(B)(i) - Harboring Aliens for Financial
Gain.

THE GRAND JURY CHARGES:

COUNT ONE

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i))

On or about May 26, 2023, in the Western District of Texas, Defendants,

(1) GABRIEL RAMOS-AGUILAR, and (2) EDGAR LOERA-PEREZ,

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others to the Grand Jury unknown, to commit an offense against the United States, namely: to transport and move and attempt to transport and move aliens within the United States knowing and in reckless disregard of the fact that said aliens had come to, entered, and remained in the United States in violation of law, said transportation being in furtherance of said violation

of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i).

COUNT TWO

(8 U.S.C. §§ 1324(a)(1)(A)(ii) and (a)(1)(B)(i))

On or about May 26, 2023, in the Western District of Texas, Defendant,

(2) GABRIEL RAMOS-AGUILAR,

knowing and in reckless disregard of the fact that aliens had come to, entered and remained in the United States in violation of law, transported and moved, and attempted to transport and move such aliens within the United States in furtherance of said violation of law, all done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i).

COUNT THREE

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(iii) and (a)(1)(B)(i))

On or about May 26, 2023, in the Western District of Texas, Defendants,

(3) ANGEL OLVERA MENDOZA, and (4) KAROL RODRIGUEZ-DELGADO,

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others to the Grand Jury unknown, to commit an offense against the United States, namely: to conceal, harbor and shield from detection and attempt to conceal, harbor and shield from detection aliens, knowing and in reckless disregard of the fact that said aliens had come to, entered and remained in the United States in violation of law, all done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(iii) and (a)(1)(B)(i).

COUNT FOUR

(8 U.S.C. §§ 1324(a)(1)(A)(iii) and (a)(1)(B)(i))

On or about May 26, 2023, in the Western District of Texas, Defendants,

(3) ANGEL OLVERA MENDOZA, and (4) KAROL RODRIGUEZ-DELGADO,

knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, concealed, harbored, and shielded from detection, and attempted to conceal, harbor, and shield from detection such aliens, all for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (a)(1)(B)(i).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY: *José Luis González*
Assistant U.S. Attorney